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7 Attorney for Jacqueline Chorney

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 JACQUELINE CHORNEY,

14 Defendant.

Case No. 2:16-mj-283-VCF

STIPULATION TO MODIFY
CONDITIONS OF RELEASE

15
16 IT IS HEREBY STIPULATED AND AGREED, by and between Steven W. Myhre,
17 Acting United States Attorney, and Jared Grimmer, Assistant United States Attorneys, counsel
18 for the United States of America, and Rene L. Valladares, Federal Public Defender, and Heidi
19 A. Ojeda, Assistant Federal Public Defender, counsel for Jacqueline Chorney, to modify her
20 conditions of release to allow her to have contact with her boyfriend, Adam Michael Harris,
21 who is a convicted felon. This stipulation is made pursuant to Title 18, United States Code,
22 Section 3563.

23 This Stipulation is entered into for the following reasons:

24 1. On November 3, 2016, Ms. Chorney was sentenced by this Court to five-year
25 probation with special conditions after she pled guilty to driving under the influence of alcohol.
26 ECF No. 22, Minutes of Proceedings. At the time of sentencing, Ms. Chorney requested the

1 Court allow her to have contact with her boyfriend who is a felon. ECF No. 22. The Court
2 declined to address that issue at the time of sentencing, but indicated in her judgment that it
3 “can address the situation with felon boyfriend when he is released from custody via a request
4 for modification of supervised release conditions.” ECF No. 23 at 6. Ms. Chorney’s boyfriend
5 was just released from custody.

6 2. Mr. Harris is also currently under supervision with the U.S. Probation office,
7 which should minimize any fear of potential criminal conduct. Both individuals intend to reside
8 together.

9 3. Undersigned counsel has been in contact with Sunny Casio, Ms. Chorney’s
10 probation officer. Probation has no opposition to this modification.

11 4. The Government likewise has no opposition to this modification.

12 DATED this 11th day of May, 2017.

13 RENE L. VALLADARES
14 Federal Public Defender

STEVEN W. MYHRE
Acting United States Attorney

15 By /s/ Heidi A. Ojeda
16 HEIDI A. OJEDA
17 Assistant Federal Public Defender

By /s/ Jared Grimmer
JARED GRIMMER
Assistant United States Attorney

1 **UNITED STATES DISTRICT COURT**

2 **DISTRICT OF NEVADA**

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 JACQUELINE CHORNEY,

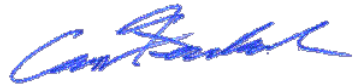
7 Defendant.

Case No. 2:16-mj-283-VCF

ORDER

9 Based on the pending Stipulation of counsel, and good cause appearing therefore, the
10 Court hereby orders that her conditions of release be modified to allow her to have contact with
11 her boyfriend, Adam Michael Harris, who is a convicted felon.

12 DATED this 12th day of May, 2017.



13
14 UNITED STATES MAGISTRATE JUDGE